

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF NSTAR GAS COMPANY TO THE  
DIVISION OF PIPELINE ENGINEERING AND SAFETY

D.T.E. 05-36

November 16, 2005

Person Responsible: Christopher Bourne

Information Request: NSTAR 1-28

Please identify all federal pipeline regulations that require records to be retained of pressure tests for plastic or other types of mains and services installed before 1980. Please provide all documents to support the Division's interpretation of the identified regulations.

Response

A natural gas pipeline must be pressure tested before being put into service to detect any leaks. Most natural gas pipeline operators, including NSTAR, also use the pressure test to establish maximum allowable operating pressure (MAOP) of a pipeline. In the case of the service line for 65 Main Street, Hopkinton, the applicable federal regulations are 49 C.F.R. Part 192, §§ 192.13 (General), 192.513 (Test requirements for plastic pipelines), and 192.619 (Maximum allowable operating pressure: Steel or plastic pipelines).

A natural gas pipeline operator, such as NSTAR, must maintain documentation showing that a pipeline has been tested prior to it being put in service. Producing a record of a pressure test is the usual way for operators to show that they have determined the MAOP for a particular pipeline.

A March 9, 1998 letter from Richard Huriaux, Director for Technology and Standards, Office of Pipeline Safety to Thomas W. Valenti, Manager, Gas Engineering & Construction, Baltimore Gas and Electric Company, states in the relevant part:

“However, the MAOP of pipelines tested under §...192-513 is governed by § 192-619. And, for plastic pipe...§ 192.619(a)(2) bases M.AOP on test pressure. **Because § 192.619(a)(2) is a federal pipeline safety standard, operators are obligated by law to provide, upon request of government inspectors, credible information to demonstrate compliance with § 192.619(a)(2).** This information would include evidence of the test pressure used to calculate [MAOP].” (Emphasis added.)

A copy of the letter is attached and marked as NSTAR Exhibit 1-30(D). Part 192 became effective on November 12, 1970. Therefore, it applies to pipelines installed before and after 1980.

Federal law also establishes a requirement for keeping records. The relevant portion of Title 49 U. S. C. § 60117:

“(b) Records, reports, and information.

To enable the Secretary to decide whether a person owning or operating a pipeline facility is complying with this chapter [49 USCS § § 60101 et seq.] and standards prescribed or orders issued under this chapter [49 USCS § § 60101 et seq.], the person shall—

- (1) maintain records, make reports, and provide information the Secretary requires; and
- (2) make the records, reports, and information available when the Secretary requests.”

49 U.S.C. § 60117.

Further “[e]ach operator shall keep records necessary to administer the procedures established under § 192.605.” 49 C.F.R. § 192.603. *See also*, 49 C.F.R. § 192.605(b)(2) and (b)(5) and exhibits NSTAR 1-30(E) and 1-30(F), requiring operators to maintain original construction documentation for the life of the pipeline.

Please see response to information request NSTAR 1-30.

Interpretation 192.619 31

March 9, 1998

US Department of Transportation

Research and Special Programs Administration

Mr. Thomas W. Valenti  
Manager, Gas Engineering & Construction  
Baltimore Gas and Electric Company  
Baltimore, MD 2103-1475

Dear Mr. Valenti:

I am responding to your November 25, 1997, letter to the Associate Administrator about the gas pipeline safety regulations in 49 CFR Part 192. Specifically, you asked if the maximum allowable operating pressure (MAOP) rule in § 192.619 requires operators to keep records of pressure tests done on steel and plastic service lines under §§ 192.511 and 192.513.

In Part 192, the recordkeeping requirements for pressure tests are in § 192.517. These requirements do not apply to pressure tests done under §§ 192.511 and 192.513. Section 192.619 does not include a separate recordkeeping requirement for pressure tests.

However, the MAOP of pipelines tested under §§ 192.511 and 192-513 is governed by § 192-619. And, for plastic pipe or steel pipe operated at 100 psig or more, § 192.619(a)(2) bases M.AOP on test pressure. Because § 192.619(a)(2) is a federal pipeline safety standard, operators are obligated by law to provide, upon request of government inspectors, credible information to demonstrate compliance with § 192.619(a)(2). This information would include evidence of the test pressure used to calculate NUOP,

I trust you find this response helpful. Please call me at (202) 366-4565 if you need further clarification.

Richard D. Hurliaux, P.E,  
Director for Technology and Standards  
Office of Pipeline Safety

US Department of Transportation

Research and Special Programs Administration